

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RUSSELL JANN,

Defendant.

Criminal No.: 17-10079

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(a)(2)

**WESTERN DISTRICT OF TN
FILED IN OPEN COURT:**

INFORMATION DATE: 11-16-17

THE UNITED STATES ATTORNEY CHARGES:

TIME: 2:11 pm

INITIALS: er

COUNT 1

(Possession of Child Pornography)

On or about February 3, 2017, in the Western District of Tennessee and elsewhere, the defendant,

RUSSELL JANN

did unlawfully and knowingly possess one or more items, specifically, a Synchronoss cloud account, which then contained visual depictions (digital computer and image files); each said visual depiction was mailed, shipped, and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and was produced using materials that had been mailed or so shipped or transported; the production of each said visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined by Title 18, United States Code, Section 2256(2)(A), and each said visual depiction is of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 2

(Possession of Child Pornography)

On or about September 5, 2017, in the Western District of Tennessee and elsewhere, the defendant,

RUSSELL JANN

did unlawfully and knowingly possess one or more items, specifically, a Toshiba external hard drive, which then contained visual depictions (digital computer and image files), including depictions of prepubescent minors under twelve years of age; each said visual depiction was mailed, shipped, and transported using a means and facility of interstate and foreign commerce, specifically, the internet; the production of each said visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined by Title 18, United States Code, Section 2256(2)(A), and each said visual depiction is of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 3

(Receipt of Child Pornography)

In or about September 2017, within the Western District of Tennessee and elsewhere, the defendant,

RUSSELL JANN

knowingly received visual depictions (computer image and video files) using a means and facility of interstate and foreign commerce, specifically, an Asus laptop computer connected to the internet; each said visual depiction had been shipped and transported in and affecting interstate and foreign commerce; the production of each said visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and each said visual depiction is of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2).

NOTICE OF INTENT TO SEEK FORFEITURE

1. The allegations contained in Count 1 of this Indictment are incorporated by reference as if fully set forth herein.

2. Upon conviction for violating Title 18, United States Code, Section 2252, the defendant, **RUSSELL JANN**, shall forfeit to the United States any and all right, title, and interest he has in:

(a) any visual depiction described in Section 2252 of Title 18 United States Code, and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of the above-said statute;

(b) any property, real or personal, constituting or traceable to gross profits of other proceeds obtained from the above-said offenses; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of the above-said offenses, including but not limited to the following:

1. One (1) Toshiba external hard drive, S/N 83RNS72HSSX3
2. One (1) Asus laptop computer, S/N F2N0WU081513067

All pursuant to Title 18, United States Code, Section 2253.

DATE: 10/30/17

D. Michael Dunavant
D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY